

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS PENSION FUND)	
)	
Plaintiffs,)	
)	No. 2013 C 3036
v.)	
)	Judge Kocoras
HAMMERLINE EXPRESS COMPANY,)	
an Illinois corporation,)	Magistrate Judge Rowland
)	
Defendant.)	

MOTION FOR DEFAULT JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADIAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on April 23, 2013 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service upon HAMMERLINE EXPRESS COMPANY, an Illinois corporation was made on the Defendant April 25, 2013, and a copy of the proof of service was filed with the court on April 25, 2013.
3. More than 21 days have passed without any response to the Complaint by Defendants, so that Defendants are now in default.

4. As supported by the attached Affidavits, the sums due on the Complaint are:

\$459,289.00 Pension
\$925.00 Attorneys fees
\$420.00 Court costs
\$460,634.00

WHEREFORE, Plaintiffs pray for the entry of an order:

- A. Finding HAMMERLINE EXPRESS COMPANY, an Illinois corporation in default; and
- B. Awarding judgment in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION FUND in the amount of \$460,634.00.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS PENSION FUND

s/John J. Toomey
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Dated: May 17, 2013